

First Annual Report to HEFCE on the implementation of the Prevent duty at the University of East Anglia 1 December 2016

1. Background

UEA's risk assessment was reviewed by Council prior to the 1.4.16 submission to HEFCE. Overall the risk to UEA is considered to be low. This is not something that is capable of precise quantification but it is a judgement based on the fact that radicalisation has not had a high profile or been considered a significant risk over many years, and reflects the positioning of the University in a small conurbation in a largely rural area. It would seem to be the case that universities in large cities are more vulnerable. As a result, a proportionate response to staff training has been adopted based on the level of risk.

2. Staff Training

The key staff groups identified for face-to-face and online training using in-house WRAP training resource are:

- Student Services
- Student Academic Advisors
- Security staff

At the time of writing the following staff have received WRAP 3 face-to-face training given by a trained member of Student Services Staff:

19 staff from Student Services
8 Security staff (Team Leaders)
25 Senior Residents¹
20 Senior Advisers
1 staff member from Human Resources
1 staff member from Centre for Staff and Educational Development.

Further WRAP training continues to be offered and new staff are invited to attend throughout the year.

Internal on-line module

The Student Academic Advisers' on-line module includes a number of Prevent training scenarios and a link to choose one of two options; the Safe Guarding Under Prevent online course or to attend WRAP 3 training. The number of staff who have enrolled and started on this training is 110 individuals to date. At present our systems do not provide information on the numbers who have actually completed the training and we are seeking to address this point for future monitoring purposes.

Recent developments in Prevent training at UEA include the newly created Safe Guarding Under Prevent training (hosted on Blackboard) which includes the Home Office training; the full programme will be live by the end of November 2016.

¹ Senior Residents are experienced students who live on campus and provide advice, guidance and support to students living in University residences.

A new information module is being developed for any staff member by the Centre for Staff and Educational Development and should go live early in 2017. This will provide general background for those interested in Prevent but not necessarily needing the level same of detail as front-line staff and their managers. Interest in the new module will be monitored.

External Training

The Registrar, Assistant Registrar, Head of Campus Support, Senior Resident Tutors and the Head of Student Services have completed the online Home Office training.

Annual awareness updates to all staff are used to communicate more widely on the Prevent duty, the need to report concerns and the mechanisms for doing so. The Registrar wrote to all staff in December 2015 and a further communication is planned for early December 2016.

Members of UEA Council are updated annually on the University's implementation of the Prevent duty and a briefing is also included in the induction for new members of Council.

3. External Speakers and Events

Policies and procedures for approving external speakers and events on campus are well established and are included in the Code of Practice for ensuring Freedom of Speech² on campus, which has been reviewed and updated to reflect Prevent guidance, and the Speakers and Events Policy and Escalation. UEA Students Union attends the University's Prevent Group and has a robust policy on external speakers based on the model issued by NUS and UUK.

In 2016 one event was escalated to the highest level of approval. The international Muslim speaker, thinker and debater Abdullah al-Andalusi was invited to speak at the Students' Union by the Islamic Society in March 2016. A standard risk assessment was carried out by the Students' Union and discussed with the University. After discussion, the risk was judged to be low and a number of measures were put in place to mitigate against the risks, including the appointment of a neutral Chair to keep discussions in line with the topic, attendance by a senior member of staff on behalf of the Registrar, social media was monitored, the event was recorded by UEA and there was a low-level presence by UEA Security. In the event, the talk went well, attendance was not unusual, content was non-controversial and there were no related incidents.

The University was also notified of another potentially controversial Muslim speaker (Moazzem Begg) by the Students' Union at a very early stage, as part of his national tour. A comprehensive risk assessment was completed to ensure freedom of speech with robust debate and challenge. This UEA event was not pursued by the speaker but is likely to be rescheduled.

² <https://portal.uea.ac.uk/documents/6207125/7465906/Section+3+Code+of+Practice+-+Freedom+of+Speech.pdf>

4. **Operation of Welfare Policies**

The Council of the University has stated its commitment to delivering the Prevent duty. The Executive Team take overall responsibility, advised by a small Prevent Group chaired by the Registrar & Secretary as Prevent Lead.

The Director of Student Services chairs UEA Students' Safety Group which includes representatives from Norfolk Constabulary and from Norwich City Council amongst others. The Head of Campus Support and the Director of Student Services maintain routine contact with the Police Authorities and the Prevent Regional Coordinator.

The Head of Campus Support is linked in to other UK HEIs through the Association of University Chief Security Officers (AUCSO) and the Director of Student Services through the Association of Managers of Student Services in Higher Education (AMOSSHE).

The University has a strong multi-faith Chaplaincy team already in place but has agreed resources to further strengthen this in areas where there is a less established infrastructure of support from the mainstream churches. During 2016 we considered the appointment of a new Muslim Chaplain (as our current Muslim Chaplain also works at Norwich Prison) but have instead decided to augment the current incumbent's services with a number of additional trained members of the Muslim faith.

The Guidance on Religious Activities and Observance on Campus has been updated including the provisions for the management of facilities for religious observance, and has been reviewed by Council.

5. **Other information**

Director of Student Services and the Head of Student Services have had two meetings this year with the Prevent Coordinator, Mark Osborn. The Head of Student Services meets monthly with the University's Special Branch contact.

Student Support Service hosts a monthly Community Safety meeting chaired by the Head of Student Services.

Director of Student Services and/or Head of Student Services have attended two CCSP meetings in 2015/16

One student has been discussed with Special Branch with the possibility of referring to the Chanel Panel, but after consideration it was decided that the student should not be referred to Channel. Details are provided below.

Brief summary of a student case: non-referral to Channel Panel after deliberations

A female international Postgraduate research student experienced some personal and professional setbacks and was consequently offered support from Student Services and her School, but did not engage. The student's behaviour became increasingly aggressive and intimidating towards staff at the University and she began to send hostile emails threatening to publicly complain about unfounded allegations that her course supervisors were attempting to delay the award of a PhD. The student also made a number of aggressive and abusive

telephone calls to staff around the University and posted similar messages on social media. The tone of her messages and the language that she was using became increasingly concerning to colleagues e.g. stating that Allah sees them and that they will be burned.

The University and UKVI were also aware that the student's visa had expired and therefore she and her family did not have any permission to be legally residing in the country.

The Head of Student Services met with the University's Special Branch contact to discuss possible referral to the Channel Panel in the light of her progressively erratic behaviour. After discussion Special Branch did not advise that this case should be referred to Channel, but did confirm that they would follow-up with colleagues in their service. It was felt that the student's wellbeing was the primary concern and staff should focus on trying to get her to engage with relevant support. This has taken place and the situation is still being closely monitored.

6. Approach to Sensitive Research

In 2016, following the Registrar's all-staff email, the Registrar's office was notified by an academic member of staff a case of a Masters student planning to undertake legitimate research into why western women are attracted to join ISIS. The student hoped to be able to download material from the ISIS website. We sought advice from special branch (Andrew Hill) and the National Counter Terrorism Policing HQ and were advised that there were no formal agreements or mechanism whereby institutions or individuals could declare that they or their academic staff intended to carry out research deemed to be highly sensitive and that they or the institution would be able to confirm that they judged the research to be legitimate academic activity:

“There is no precedent that we know of that enables someone to legitimately access what would be proscribed material uploaded by a terrorist organisation for research purposes. Whilst there is a defence in law to s.58 Terrorism Act 2000, you'll see that it applies to someone charged with an offence to then argue that they had a reasonable excuse for holding that information.

We obviously acknowledge the diligence shown in seeking advice prior to starting any such research but because of the above information, we can't advocate access/downloading of this type of information for this purpose.”

This advice was passed to the University's Research Ethics Committee (UREC) who considered the case and reported back as follows:

“... the research depends on accessing material that is covered by the Terrorism Act (2000) and it might be judged to be a criminal offence. Advice from Special Branch indicates that there is no precedent for gaining legal access to proscribed material of this kind. There is no way to get legitimate access, for research purposes, to proscribed material uploaded by a terrorist organisation. In the end it would be for the courts to decide if the 'researcher' had a reasonable excuse for accessing and / possessing proscribed material.

While there may be ethical issues raised by the material of which we are unaware, the main ethical issues concern the safety of the researcher and the responsibilities of the University. Since accessing this material would be, prima facie, a criminal offence, it would place the student and University at unacceptable risk. If the research went ahead the student could face risk of prosecution and might be unable to finish her research and the University would risk being seen to sanction a breach of the law and could be vicariously liable. Given that by design the research involves a potentially criminal act, it would not be covered by insurance. The legal costs could be considerable. My view as Chair UREC is that the risks to the student researcher and by implication to the University are significant and are not outweighed by the potential benefits that might flow from this MA level research project.

My judgement is that the research should not be approved and the student should be encouraged to find a different and less hazardous way of studying this interesting topic.”

This advice was followed and no further issues have arisen.

7. Approach to web filtering in relation to the Prevent duty

The University’s established policies have been reviewed in light of the Prevent guidance. Access to a small number (14) of extremist web sites including some Islamic and White Pride sites have been blocked on the advice of the Prevent coordinator. Access can be given to legitimate researchers upon request.

In our judgement there is a tension between blocking access and monitoring access that needs to be considered further. Blocking access to websites may simply push the activity on to other network providers meaning we would not be able to readily monitor potential access. Allowing free access, but monitoring a defined set of websites is probably more within the spirit of the Prevent duty as it allows the University to identify people potentially at risk of radicalisation.

Whichever approach is adopted, the key issue is how we keep up to date on which sites should be monitored / blocked in a rapidly changing environment. We are aware that JISC have recently developed a curated list that can be used either with a blocking service that they provide or that can be used with internal tools.

We have concerns about the impact that the JISC service would have on our network performance and are currently looking at options for running a monitoring service in house, though there will be cost implications.

The University actively monitors social media where the University is referenced.

8. Franchise partner institutions

Whilst UEA has validated provision at Further Education Colleges, we have no franchise partner institutions.

9. Outcome of Prevent duty monitoring submission assessment 1 June 2016

For the record, the requests for further information by HEFCE arising from the April submission have been dealt directly via email as requested, a copy of which is provided as Appendix 1.

8. Risk Assessment

An updated risk assessment is appended as Appendix 2.

Appendix 1.

Outcome of Prevent duty monitoring submission assessment 1 June 2016

For the sake of completion, the responses to the 1 June 2016 outcome letter are included here:

Accountable Officer sign off

1. Could you confirm that this submission has been signed off by Professor David Richardson in his capacity as the University Accountable officer? *Yes*

Training

2. Could you advise if the University makes use of contractors/third party members of staff and if so, how they are reflected in the training plan? *No*
Could you advise on the expected timescale for completing the initial roll out of training? *End of Year.*

Leadership

3. Could you provide a little more information on you will keep the Governing body updated on the University Prevent activity? *Annual update to Council from the Registrar.*

Chaplaincy

4. Could you provide a little more information on the management of any faith facilities offered by the University? *Run by a team of chaplains reporting to Head of Student Services.*

IT

5. Could you provide a little more information on how your 'Conditions of computer use' policy have been updated to reflect Prevent?
Conditions of computer use has been updated – please see page 5, para 3.4(b) which says that:

"Accessing, creating, storing or transmitting (other than for properly supervised and lawful purposes) offensive, obscene or indecent data or images, or data from which such material could be derived, or material that might be subject to the provisions of counter-terrorism legislation."

is expressly forbidden.

The footnote to this paragraph says:

"Where academic use is likely to include such material, authorisation should first be sought from the Head of School and the relevant research or ethics committee and the Information Services Assistant Director Strategy, Policy and Compliance made aware. Consultation with external authorities may be required and is advisable under certain circumstances depending on the nature of the activity. In particular, all use of material subject to counter-terrorism legislation shall be used only in accordance with the Counter-Terrorism and Security Act 2015 and following UUK guidance on the handling of security sensitive material
<http://www.universitiesuk.ac.uk/highereducation/Pages/OversightOfSecuritySensitiveResearchMaterial.aspx>."

<https://www.uea.ac.uk/foh/mpe/practice-educators/uea-policies-and-guidelines>

6. Could you provide a little more information on the process for an individual to undertake sensitive research?

Annual letter to all Heads of School, encourages all staff to get in contact with Registrar if there are any issues/planned research into sensitive areas. We then seek advice as appropriate from special branch liaison or prevent coordinator. We have had one such case so far.

Appendix 2.
Updated Prevent Risk Assessment November 2016

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
1	Students or staff being drawn into radicalisation or extremist activity by influences on and off campus	<p>a) Identified instances or incidents where radicalisation and extremism are evident of linked to personal or group activities.</p> <p>b) Report by students or staff.</p> <p>c) Information provided by Police, Local Authorities or Prevent Regional Coordinator.</p> <p>d) Information from other external sources.</p> <p>e) Press or media.</p> <p>f) Concern expressed for any students through the safeguarding procedure.</p> <p>g) Concern expressed for any staff through general raising of awareness.</p> <p>h) Social media activity.</p>	<ul style="list-style-type: none"> • Commitment to the implementation of the Prevent Duty Guidance at the highest level • Reporting through safeguarding policy and where appropriate to partner authorities and agencies; • On-going support to individuals and groups; • Training of key groups of staff and general raising of awareness; • Effective channel capability. 	<p>Commitment to Prevent compliance by Council and the Executive Team – completed</p> <p>Prevent Implementation Group conducting a regular review of Prevent landscape in the University meeting regularly, reviewing relevant policies and their effective implementation and reporting to the Executive Team – in place</p> <p>Effective mechanisms for regular liaison with Police and Prevent Regional Co-ordinator – in place</p> <p>Training has taken place/planned for:</p> <ul style="list-style-type: none"> • Dean of Students' staff • Academic Advisors (on appointment and thereafter on a 3-year cycle) • Security staff <p>-in place</p> <ul style="list-style-type: none"> • Annual awareness bulletin to advisors and through the staff bulletin to all other staff reminding them of the Prevent Duty, the need to report concerns and the mechanisms for doing so <p>- first bulletin Dec 2015, will be repeated Dec 2016</p>	1	5	

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
				<ul style="list-style-type: none"> • Strong pastoral support through multifaith Chaplaincy – <i>in place</i> • The current resources providing support and leadership and guidance to Islamic students to be strengthened through additional support for the part-time Muslim Chaplain – <i>ongoing</i> • Safeguarding policies reviewed and updated in the light of Prevent Guidance – <i>completed November 2015 and updated during 2016.</i> 			
2	Production, dissemination or access to radical, extremist or terrorism related material or internet resources	<p>a) Use of University IT systems and networks for production and dissemination.</p> <p>b) Print materials in evidence on University property.</p> <p>c) Use of University related or hosted social networking sites for extremist/radical or terrorism related discussion.</p>	<ul style="list-style-type: none"> • IT systems can be key word/phrase monitored; • University’s Conditions of Computer Use policy updated to reflect Prevent guidance. • Handing out printed material is a regulated activity at UEA. Non-compliant print materials are removed and reported to relevant authorities; • Social networking policy in place; • Development of information gathering and monitoring capability in IT systems in line with legal requirements and constraints and University IT security plan. • Some websites blocked on the advice of Regional coordinator. • Consideration given to blocking 	<p>JISC written guidance on IT filtering under consideration. Until such time, we will keep this risk as amber.</p> <p>All policies will be kept under review and will be updated in line with new guidance.</p>	3	4	

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
			anonymization services such as Tor; not favoured at present.				
3	Access to University site by external influences, speakers	<p>a) Activities, events and meetings identified through the Code of Practice on Freedom of Speech as likely to comprise extremist views.</p> <p>b) Presence of unauthorised speakers on site.</p> <p>c) Reports by students and employees.</p> <p>d) Information from external sources.</p>	<ul style="list-style-type: none"> • Application of Code of Practice on Freedom of Speech leading to identification of all activities, events or meetings which may lead to extremist views being expressed and risk drawing people into terrorism and these being prohibited or risk mitigated; • Regular security patrols and CCTV coverage. 	<ul style="list-style-type: none"> • Code of Practice on Freedom of Speech updated to include Prevent Guidance – <i>completed November 2015</i> • Prevent training for Security Staff – <i>in place</i> • Effective monitoring of all bookings for activities, events and meetings through a refreshed online booking system - <i>2016</i> • Policy for the use of all prayer facilities on campus to be reviewed in light of Prevent Guidance – <i>completed October 2015</i> • Use of prayer facilities monitored by the Multifaith Chaplaincy Team – <i>in place and strengthened in March 2016</i> 	1	4	
4	Failure to make full and appropriate use of the opportunity for partnership working		<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Oversight by UEA's Prevent Implementation Group and collaboration with the Police, Special branch, Local Authorities, the Regional Prevent Coordinator and other agencies eg Wymondham Police partnership working group – <i>in place.</i> • UEA Head of Campus Support point of contact linked into other UK HEIs through the Association 			

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
				of University Chief Security Officers (AUCSA) – <i>in place</i> • Single point of contact for partner organisations – <i>in place, Student Services</i>			

Risk Estimates

Probability: 1-5

Impact: 1-5

Green: Low Risk 1-9

Amber: Medium Risk 10-15

Red: High Risk 16-25

Prevent monitoring: Annual report governing body/proprietor declaration

Throughout academic year 2015-16 and up to the date of approval, [Provider name]:

- has had due regard to the need to prevent people being drawn into terrorism (the Prevent duty)
- has provided to HEFCE all required information about its implementation of the Prevent duty
- has reported to HEFCE in a timely way all serious issues related to the Prevent duty, or now attaches any reports that should have been made, with an explanation of why they were not submitted.

Name	[Enter name of Chair of governing body/proprietor]
Signed	[Paste electronic signature or sign here]
Date	[Enter date signed]